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July 30, 2008

VIA FAX

Hon. John G. Koeltl  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Room 1030  
New York, NY 10007

Re: *Pitsiladi et al. v. Guerrero et ano.*  
Civil Action No.: 07-CV-06605-JGK

Dear Judge Koeltl:

This firm represents the defendants, William Guerrero and City Property Management and Development Inc., in the above-referenced case. This letter is a request to extend the deadlines in this action pursuant to the following proposed amended scheduling order:

Deadline to complete all discovery – from July 30, 2008 to December 31, 2008

Dispositive motions to be completed by – from August 29, 2008 to January 28, 2009

Joint pretrial order together with any in limine motions due by – from September 26, 2008 to February 27, 2009

Parties shall be ready for trial on or after – from October 15, 2008 to March 20, 2009

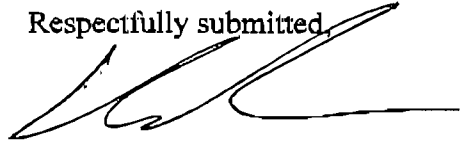
We have discussed the extension with attorneys for the plaintiffs, and they have agreed to such extension in principal. However, we did not have a chance to discuss specific dates, but did not want to delay writing to the Court. The reason for the extension is ongoing discovery between the parties, including discovery as to defendant's counterclaim. Motion to dismiss this counterclaim was recently denied by this Court, which expressed willingness to extend deadlines

*Application granted.  
No further extensions  
without an affidavit  
supported by  
good cause.  
So ordered.  
7/30/08 J.G.K.*

at the oral argument of the motion. In addition, plaintiffs are South African residents, which creates difficulty in obtaining visas according to the plaintiffs' counsel. Furthermore, all parties have recently appeared before Magistrate Judge Francis, and discussed various issues, including motion to compel discovery recently made by the defendants. This is the second request for adjournment of the deadlines.

Thank you for your prompt attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'L. Gekhman', written over a horizontal line.

Leonard Gekhman (LG 7488)

cc: Jack S. Dweck, Esq.